



FitzGerald Morris
Baker Firth
Attorneys & Counselors

John D. Aspland, Jr.
Partner
jda@fmbf-law.com

April 25, 2018

Via ECF Only

Magistrate Judge Daniel J. Stewart
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, NY 12207

Re: Cinthia Thevenin v. City of Troy, et al.
Index No.: 1:16-cv-11115(NAM/DJS)
RJI No.:
Our File No.: 11166-0001

Dear Judge Stewart:

As the Court may recall, Defendants had advised the Court of their intention to seek the depositions of certain employees of the New York State Office of the Attorney General ("OAG"), by letter dated February 22, 2018. Specifically, Defendants are seeking the depositions of the following individuals from the OAG: Ronald Enfield (Investigator), Mitchell J. Paurowski (Investigator), Paul Clyne (Deputy Chief), Nicholas Viorst (Deputy Chief), and Antoine J. Karam (Deputy Chief).

To that end, we respectfully request that the Court So-Order the enclosed subpoenas to the above-named individuals, so as to allow the parties to obtain their deposition testimony and move forward with the completion of discovery in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "JDA", with a long horizontal flourish extending to the right.

John D. Aspland, Jr.

JDA/aan

cc: Michael A. Rose, Esq., Hach & Rose LLP
Neil S. Torczyner, Esq., Harfenist Kraut & Perlstein LLP
Steven J. Harfenist, Esq., Harfenist Kraut & Perlstein LLP